

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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Jane Doe,

X

Plaintiff,

v.

SEAN COMBS, DADDY'S HOUSE  
RECORDINGS INC., CE OPCO, LLC d/b/a  
COMBS GLOBAL f/k/a COMBS ENTERPRISES  
LLC, BAD BOY ENTERTAINMENT  
HOLDINGS, INC., BAD BOY PRODUCTIONS  
HOLDINGS, INC., BAD BOY BOOKS  
HOLDINGS, INC., BAD BOY RECORDS LLC,  
BAD BOY ENTERTAINMENT LLC, BAD BOY  
PRODUCTIONS LLC, ORGANIZATIONAL  
DOES 1-10, INDIVIDUAL DOES 1-10, AND  
SHAWN CARTER

24-cv-07975-AT

Defendants.

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X

**DECLARATION OF ALEX SPIRO IN SUPPORT OF DEFENDANT SHAWN  
CARTER'S MOTION TO DENY PLAINTIFF'S REQUEST TO PROCEED  
ANONYMOUSLY PURSUANT TO FED. R. CIV. P. 10(a) OR TO DISMISS THE  
COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(1)**

I, Alex Spiro, declare as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP. If called as a witness, I could and would testify competently to the information contained herein.
2. Attached hereto as **Exhibit 1** is a true and correct copy of the complaint in Civil Action No. 248MCV05637, in the Superior Court of the State of California, County of Los Angeles.
3. Attached hereto as **Exhibit 2** is a true and correct copy of the Opinion & Order Denying Motion to Proceed Under a Pseudonym in Civil Action No. 24-cv-8054 in the United States District Court for the Southern District of New York.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Opinion & Order Denying Motion to Proceed Under a Pseudonym in Civil Action No. 23-CV-10628 in the United States District Court for the Southern District of New York.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the Instagram post from the account of Anthony Buzbee dated December 8, 2024.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Twitter post from the account of Anthony Buzbee dated December 8, 2024.

I declare under the penalty of perjury that the foregoing statements are true and correct. Executed in New York, New York on the 9<sup>th</sup> day of December 2024.

DATED: December 9, 2024

/s/ Alex Spiro

Alex Spiro